

ID: CCA-8894766-13

Office:

UILC: 165.06-00

Number: **201333012**

Release Date: 8/16/2013

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**From:**

**Sent:** Monday, March 18, 2013 10:33 AM

**To:**

**Cc:**

**Subject:** RE: section 165

I looked over the cases and the Rev. Rul, and it seemed to me that potential future value is a component of determining the value of intangible assets, and in that context is still relevant in determining the stock's worthlessness. I have send an e-mail to

who has worked with Rev. Rul 2003-125 to some extent to get his opinion also.

He is on